

APPENDIX B
DOCUMENTS CONSIDERED IN I-695 CASES
March 14, 2000

ATU/VMICC No. 99-2-27054-1SEA and No. 99-2-27694-9SEA

1. Amended Complaint for Injunctive and Declaratory Relief for Violations of the Washington Constitution (ATU)
2. Amended Complaint for Injunctive and Declaratory Relief for Violations of the Washington Constitution (VMICC)
3. Answer of Defendant State of Washington to Amended Complaint of the Amalgamated Transit Union Local 587, et al.
4. Answer of Defendant State of Washington to the Amended Complaint of the Vashon-Maury Island Community Council
5. Answer of Intervenor to Complaint of Amalgamated Transit Union Local 587 et al.
6. Answer of Intervenor to Complaint of Vashon-Maury Island Community Council
7. Motion of Plaintiffs ATU Local 587, AFL-CIO, Barry Samet, Jerry Deneke, Joe Mangiameli, and T. Dale Huston for Summary Judgment (with Appendix A and B)
8. Declaration of Michael C. Subit (with Attachments 1-6)
9. Declaration of Joe Mangiameli (with Attachments A and B)
10. Declaration of Rick Walsh
11. Motion of Plaintiff Vashon-Maury Island Community Council for Summary Judgment
12. Declaration of David S. Vogel (with Exhibits 1 and 2)
13. State of Washington's Cross-Motion for Summary Judgment and Memorandum in Opposition to Plaintiffs' Motions for Summary Judgment (Corrected)
14. Declaration of Jeffrey D. Goltz in Support of State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motions for Summary Judgment (with Exhibit A: Deposition of Cynthia Weed; Exhibit B: Deposition of Richard Hanna; and Exhibit C: Deposition of Ralph Eells)
15. Declaration of Pamela Floyd in Support of the State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motions for Summary Judgment (with Exhibits A-L)

16. Intervenor's Opposition to Defendants' Motion for Summary Judgment and Memorandum in Support of Intervenor's Motion for Partial Summary Judgment
17. Declaration of Richard M. Stephens (with Exhibits A-Y)
18. Intervenor's Objection to Evidence and Motion to Strike
19. Amicus Curiae Brief of League of Women Voters of Washington
20. Brief of Amicus Curiae Inlandboatmen's Union of the Pacific
21. Declaration of David Freiboth
22. Amicus Brief of Conley "Gene" E. Kincheloe, Jr., Josie L. Schindler, and the Washington Coalition of Citizens with Disabilities
23. Declaration of Eleanor Hamburger (with Exhibits A-C)
24. Declaration of Conley "Gene" E. Kincheloe, Jr.
25. Amicus Brief of Washington Society of Professional Engineers
26. State of Washington's Reply to Plaintiffs and Response to Amici Curiae (ATU/VMICC)
27. Intervenor's Reply in Support of Motion for Summary Judgment
28. Motion of ATU Plaintiffs and Vashon-Maury Island Community Council to Strike State of Washington's Reply to Plaintiffs and Intervenor's Reply in Support of Motion for Summary Judgment

Cities No. 00-2-00048-1SEA

1. Complaint for Declaratory Judgment and Injunctive Relief
2. Answer of Intervenor
3. Answer of Defendant State of Washington to Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief
4. Cities Motion and Supporting Memo for Summary Judgment Re: Constitutionality and Interpretation of I-695 (with Appendix A-E)
5. Affidavit of Ralph Eells

6. Affidavit of Lynn Horton
7. Affidavit of D. Scott Rohlfs
8. Affidavit of Dwight Sutton
9. Affidavit of Cynthia Weed
10. State of Washington's Cross-Motion for Summary Judgment and Memorandum in Opposition to Plaintiffs' Motions for Summary Judgment (Corrected)
11. Declaration of Jeffrey D. Goltz in Support of State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motions for Summary Judgment (with Exhibit A: Deposition of Cynthia Weed; Exhibit B: Deposition of Richard Hanna; and Exhibit C: Deposition of Ralph Eells)
12. Declaration of Pamela Floyd in Support of the State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motions for Summary Judgment (with Exhibits A-L)
13. Intervenor's Opposition to Defendants' Motion for Summary Judgment and Memorandum in Support of Intervenor's Motion for Partial Summary Judgment
14. Declaration of Richard M. Stephens (with Exhibits A-Y)
15. Cities' Reply in Support of Their Motion for Summary Judgment and Opposition to Defendants' Cross-Motions
16. Affidavit of John W. Hough (with Attachments 1-6)
17. Intervenor's Reply in Support of Motion for Summary Judgment
18. State of Washington's Reply to Plaintiffs and Response to Amici Curiae

Utilities No. 00-2-00049-9SEA

1. Complaint for Declaratory Relief
2. Motion to Intervene
3. Declaration of Tim Eyman in Support of Motion to Intervene
4. Answer of Intervenor
5. Answer of Defendant State of Washington to Plaintiffs' Complaint for Declaratory Relief

6. Plaintiffs' Motion for Judgment on Interpretation and Validity of I-695 (Corrected) (with Tabs A-D)
7. January 19, 2000 Declaration of Dwight Dively Regarding City of Seattle General Fund and MVET
8. January 19, 2000 Declaration of Diana H. Gale Regarding Plaintiff Seattle Public Utilities (with Exhibit A)
9. January 19, 2000 Declaration of Kenneth J. Merry Regarding Plaintiff Tacoma Water (with Exhibit A-B)
10. January 19, 2000 Declaration of Peter C. Luttrupp Regarding City of Tacoma General Fund and MVET
11. Declaration of Judith L. Nelson - January 18, 2000 Re: Covington Water District (with Exhibits A and B)
12. January 19, 2000 Declaration of Beverly Tweddle Regarding Plaintiff Lakehaven Utility District (with Exhibits A and B)
13. January 19, 2000 Declaration of Robert O. Yeasting Regarding Municipal Bonds and Financing
14. January 19, 2000 Declaration of Grover E. Cleveland Authenticating Documents (Tabs A-V)
15. State of Washington's Cross-Motion for Summary Judgment and Memorandum in Opposition to Plaintiffs' Motions for Summary Judgment (Corrected)
16. Declaration of Jeffrey D. Goltz in Support of State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motions for Summary Judgment (with Exhibit A: Deposition of Cynthia Weed; Exhibit B: Deposition of Richard Hanna; and Exhibit C: Deposition of Ralph Eells)
17. Declaration of Pamela Floyd in Support of the State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motions for Summary Judgment (with Exhibits A-L)
18. Intervenor's Opposition to Defendants' Motion for Summary Judgment and Memorandum in Support of Intervenor's Motion for Partial Summary Judgment
19. Declaration of Richard M. Stephens (with Exhibits A-Y)
20. First Amended Complaint for Declaratory Relief

21. Stipulated Order Granting Leave to File Amended Complaint
22. Amended Proposed Order Granting Plaintiffs' Motion for Summary Judgment
23. Tacoma Water Plaintiffs' Combined (1) Opposition to Cross-Motions of the Defendant State of Washington and the Intervenor \$30 License Tab Initiative Campaign, and (2) Reply on Plaintiffs' Motion for Judgment on the Interpretation and Validity of I-695 (Attachments E-G)
24. January 19, 2000 [sic] Response Declaration of Lakehaven Utility District
25. January 19, 2000 [sic] Response Declaration of Seattle Public Utilities
26. January 19, 2000 [sic] Response Declaration of Plaintiff Tacoma Water Div.
27. January 19, 2000 [sic] Response Declaration of Covington Water District
28. Intervenor's Reply in Support of Motion for Summary Judgment
29. State of Washington's Reply to Plaintiffs and Response to Amici Curiae

PUD No. 00-2-01137-7SEA

1. Complaint for Declaratory and Injunctive Relief
2. Answer of Defendant State of Washington to Plaintiff's Complaint for Declaratory and Injunctive Relief
3. Plaintiff Public Utility District No. 1 of Snohomish County's Memorandum of Points and Authorities in Support of Motion for Summary Judgment
4. Declaration of Paul D. Elias in Support of Plaintiff Public Utility District No. 1 of Snohomish County's Motion for Summary Judgment (with Exhibit A)
5. Declaration of Cynthia J. Larsen in Support of Plaintiff Public Utility District No. 1 of Snohomish County's Motion for Summary Judgment (with Exhibits A and B)
6. State of Washington's Cross-Motion for Summary Judgment and Memorandum in Opposition to Plaintiffs' Motions for Summary Judgment (Corrected)
7. Declaration of Jeffrey D. Goltz in Support of State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motions for Summary Judgment (with Exhibit A: Deposition of Cynthia Weed; Exhibit B: Deposition of Richard Hanna; and Exhibit C: Deposition of Ralph Eells)

8. Declaration of Pamela Floyd in Support of the State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs' Motions for Summary Judgment (with Exhibits A-L)
9. Intervenor's Opposition to Defendants' Motion for Summary Judgment and Memorandum in Support of Intervenor's Motion for Partial Summary Judgment
10. Declaration of Richard M. Stephens (with Exhibits A-Y)
11. Snohomish PUD's Opposition to Intervenor's Cross-Motion for Summary Judgment and Reply Memorandum in Support of Snohomish PUD's Motion for Summary Judgment
12. Declaration of Michael J. Gianunzio Re: Motion for Summary Judgment
13. Intervenor's Reply in Support of Motion for Summary Judgment
14. Brief of Amicus Curiae Chelan County PUD, Clark County PUD, Mason County PUD #3 and Douglas County PUD
15. State of Washington's Reply to Plaintiffs and Response to Amici Curiae

Ports No. 00-2-01097-4SEA

1. Complaint for Declaratory Judgment
2. Plaintiffs' Motion for Summary Judgment
3. Declaration of Paul J. Lawrence in Support of Plaintiffs' Motion for Summary Judgment (with Exhibits A-C)
4. Declaration of M.R. Dinsmore, Port of Seattle, in Support of Plaintiffs' Motion for Summary Judgment (with Exhibit A)
5. Declaration of James S. Darling, Port of Bellingham, in Support of Plaintiffs' Motion for Summary Judgment (with Exhibit A)
6. Declaration of Joe Poire, Port of Whitman County, in Support of Plaintiffs' Motion for Summary Judgment
7. Declaration of Andrea Riniker, Port of Tacoma, in Support of Plaintiffs' Motion for Summary Judgment
8. Declaration of Jerold W. Heller, Port of Skagit County, in Support of Plaintiffs' Motion for Summary Judgment

9. Declaration of Ken O'Hollaren, Port of Longview, in Support of Plaintiffs' Motion for Summary Judgment
10. Declaration of John Givens, Port of Kennewick, in Support of Plaintiffs' Motion for Summary Judgment
11. Declaration of Steve Simpson, Port of Friday Harbor, in Support of Plaintiffs' Motion for Summary Judgment
12. Intervenor's Opposition to Defendants' Motion for SJ and Memorandum in Support of Intervenor's Motion for Partial Summary Judgment
13. Declaration of Richard M. Stephens (with Exhibits A-Y)
14. State of Washington's Cross-Motion for Summary Judgment and Memorandum in Opposition to Plaintiff Ports' Motion for Summary Judgment (with Attach. A: State of Washington's Cross-Motion for Summary Judgment and Memorandum in Opposition to Plaintiffs' Motions for Summary Judgment (Corrected))
15. Declaration of Jeffrey D. Goltz in Support of State's Cross-Motion for Summary Judgment and in Opposition to Plaintiffs Ports' Motion for Summary Judgment (with Exhibits A and B);
16. Campaign's Response to Ports' Motion for Summary Judgment
17. Plaintiff's Reply in Support of Motion for Summary Judgment and Response to Defendants' Cross-Motions
18. Declaration of Jerry Ahmann, Port of Tacoma, in Support of Plaintiffs' Motion for Summary Judgment
19. Supplemental Declaration of Ken O'Hollaren, Port of Longview, in Support of Plaintiffs' Motion for Summary Judgment
20. Supplemental Declaration of M.R. Dinsmore, Port of Seattle, in Support of Plaintiffs' Motion for Summary Judgment
21. Intervenor's Reply in Support of Motion for Summary Judgment
22. State of Washington's Reply to Plaintiffs and Response to Amici Curiae

Air Agency No. 00-2-02023-6SEA

1. Complaint for Declaratory Judgment

2. Summary Judgment Motion by Puget Sound Clean Air Agency
3. Declaration of James L. Nolan in Support of Clean Air Agency's Summary Judgment Motion (with Exhibits A and B)
4. State of Washington's Cross-motion for Summary Judgment and Memorandum in Opposition to Plaintiff Air Agency's Motion for Summary Judgment (with Attachments A-C)
5. Declaration of Roger Dovel in Support of Washington's Cross-Motion for Summary Judgment
6. Declaration of Gary McIntosh in Support of the State of Washington's Cross-Motion for Summary Judgment
7. Reply Brief of Puget Sound Clean Air Agency in Support of its Summary Judgment Motion (with Appendix A)
8. Supplemental Declaration of James L. Nolan in Support of the Clean Air Agency's Summary Judgment Motion
9. [Sworn] Statement of Les Ornelas in Support of the Puget Sound Clean Air Agency.
10. State of Washington's Reply to Plaintiffs and Response to Amici Curiae

In addition, in the *Air Agency* case, the Court also considered the various summary judgment briefs, declarations, and evidence filed by the State, the Intervenor, and the other plaintiffs and amici curiae in the other Initiative 695 cases, which were not consolidated, but were linked and considered at the same time.